



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII

999 18th STREET - SUITE 500
DENVER, COLORADO 80202-2405

Ref: 8HWM-FF

OCT 29 1990

Mr. George DiCiero, City Manager
City of Broomfield
#6 Garden Office Center
Broomfield, CO 80020

ADMIN RECORD

Dear Mr. DiCiero:

Based on discussions at the October 10, 1990, meeting of the Rocky Flats Coordination Group and the October 18, 1990, meeting between representatives of EPA and the Cities of Westminster, Broomfield, Thornton and Northglenn (Cities) it is EPA's understanding that the Cities intend to begin activities related to construction of the project to divert Woman Creek around the Standley Lake Reservoir during this calendar year. As you know from these discussions, EPA continues to have concerns about the proposed project and how the activities relate to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) process. The intent of this letter is to clarify those concerns and to reiterate our point of view which has been expressed previously. We are confident that our concerns can be addressed by the appropriate actions on the part of the Cities. I suggest that we begin working sessions between the technical representatives from all concerned parties and that these exchanges continue throughout the design and construction process. EPA is interested in ensuring that your proposed project does not contravene CERCLA requirements as well as satisfies the concerns of your community.

Our concerns with the proposed project can be summarized as follows:

a. The construction is proposed within the boundaries of a CERCLA site undergoing CERCLA response activities. We are concerned that the proposed project may be inconsistent with these CERCLA activities. Therefore, it is critical that you involve EPA during the design of this project and allow us to suggest design features which may avoid potential inconsistencies with CERCLA. However, regardless of EPA involvement, since selection of a CERCLA remedy at this time is premature, any action taken by the Cities is at risk with respect to a CERCLA remedy.

b. The construction activities may have the potential to release hazardous substances into the environment and thereby endanger public health or the environment. Therefore, prior to construction, you need to assess the potential for such a release

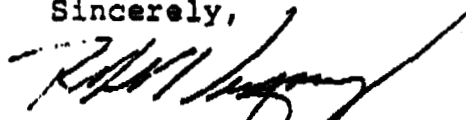
as well as its impact on public health and the environment. Such an assessment must consider all contaminants present at a site, actual and potential exposure pathways, actual and potential exposure routes, and exposed populations (including construction workers). To date, we are not aware that such an assessment has been completed. The information that was presented to EPA at the October 18, 1990, meeting was incomplete with respect to both the suite of hazardous substances that may be present as well as sufficient data within the vicinity of the proposed project.

c. Without a clear understanding of the nature and extent of the soil and sediment contamination at and adjacent to the Rocky Flats Plant, we are concerned that an assessment cannot be made of the impacts on downstream human and environmental populations resulting from the diversion of Woman Creek and the interception of potentially contaminated runoff. It may be necessary to control discharges downstream and/or monitor the status of downstream sediments and water. However, such decisions are premature without the necessary data and assessment.

EPA is committed to protecting the waters of the State of Colorado and to assisting the Cities in maintaining the high quality of their drinking water. We suggest the Cities design and conduct a study which assesses whether the project will pose a threat to human health or the environment. Such a study should include an appropriate data collection program and risk evaluation. If the Cities can demonstrate with an acceptable level of confidence that there is no contamination present in the areas of the proposed construction, or that the contamination present does not constitute a health risk as a result of the construction activities or the resulting diversion, our environmental concerns will be satisfied.

We look forward to working with the Cities in evaluating the environmental impacts as well as throughout the design and construction phases of the project to resolve our concerns. Please contact Ms. Bonita Lavelle at (303) 294-1165 to arrange a meeting to initiate technical discussions on this matter.

Sincerely,



Robert Duprey, Director
Hazardous Waste Management
Division

cc: Melanie Barger, OS-530
Matt Glasser, City of Broomfield
Thomas Looby, CDH
Robert M. Nelson, DOE/RFO